



Honorable August B. Landis  
United States Bankruptcy Judge



Entered on Docket  
November 07, 2022

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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA**

In re:

FRONT SIGHT MANAGEMENT LLC,  
  
Debtor.

Case No.: 22-11824-ABL

Chapter 11

**Confirmation Date:**

Date: November 18, 2022  
Time: 9:30 a.m.

**ORDER APPROVING STIPULATION REGARDING LAS VEGAS DEVELOPMENT  
FUND, LLC'S TREATMENT UNDER DEBTOR'S SECOND AMENDED CHAPTER 11  
PLAN OF REORGANIZATION**

The Court has considered the *Stipulation Regarding Las Vegas Development Fund, LLC's Treatment Under Debtor's Second Amended Chapter 11 Plan of Reorganization* (the "Stipulation")<sup>1</sup> between and among Front Sight Management LLC (the "Debtor"), by and through its counsel BG Law; Nevada PF, LLC ("Nevada PF"), by and through its counsel, Schwartz Law;

<sup>1</sup> Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

1 Dr. Ignatius Piazza, Jennifer Piazza, VNV Dynasty Trust I, and VNV Dynasty Trust II  
2 (collectively, the "Piazzas"), by and through their counsel, Garman Turner Gordon; and Las Vegas  
3 Development Fund, LLC ("LVDF", and together with Debtor, Nevada PF, and the Piazzas, the  
4 "Parties"), by and thorough its counsel, the Law Office of Brian D. Shapiro and Jones Lovelock, and  
5 good cause appearing therefor:

6 **IT IS HEREBY ORDERED:**

- 7 1. The Stipulation is approved in its entirety.
- 8 2. The Debtor and Nevada PF shall increase the LVDF Claim Reserve by \$750,000, to  
9 a total of \$12,555,706.01. If the Plan is confirmed, then LVDF's lien shall attach only to the Claim  
10 Reserve of \$12,555,706.01.
- 11 3. The Plan confirmation order shall provide that the LVDF Interest Provision is stricken  
12 in its entirety. For avoidance of doubt, any interest on the principal amount of the LVDF Claim shall  
13 be determined in connection with the adjudication of the Claim Objections.
- 14 4. Except as stated herein, LVDF shall not be required to file an opposition to the Claim  
15 Objections.
- 16 5. The Debtor, LVDF, and the Piazzas shall attend an in-person settlement conference  
17 (the "Settlement Conference") related to the LVDF Claim, Claim Objections, and Adversary  
18 Proceeding on December 8 and 9, 2022 before the Honorable Peggy Leen. The cost of such  
19 Settlement Conference (which shall be immediately due) shall be split 50/50 between LVDF, on the  
20 one hand, and the Debtor on the other hand
- 21 6. The Debtor, LVDF, and the Piazzas shall, no later than the conclusion of the  
22 Confirmation Hearing, request that the Bankruptcy Court set a firm trial date at the earliest possible  
23 date to resolve the LVDF Claim, the Claim Objections, and the Adversary Proceeding.
- 24 7. If a settlement is not reached at the Settlement Conference, the Parties shall stipulate  
25 to a mutually agreeable discovery and briefing schedule related to the Claim Objections and the  
26 Adversary Proceeding and if unable to stipulate, then the Court shall enter a discovery and briefing  
27 schedule related to the Claim Objections and the Adversary Proceeding. The briefing schedules shall  
28 set forth the deadlines for LVDF to file an opposition, if necessary, to the Claim Objections.

8. If a settlement is not reached at the Settlement Conference, then an in-person deposition of Dr. Ignatius Piazza shall take place on January 4, 2023, and a deposition of Jennifer Piazza will take place via zoom or some similar format on January 3, 2023. The Parties agree that these shall be firm deposition dates and will not be continued or moved absent Court order or by stipulation.

9. LVDF shall not object to the Plan.

10. LVDF shall submit a ballot voting in favor of the Plan by the voting deadline of November 4, 2022.

IT IS SO ORDERED.

Submitted by:

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